

May 13, 2003

LICENSEE: Tennessee Valley Authority

FACILITY: Browns Ferry Nuclear Plant, Unit 1

SUBJECT: SUMMARY OF APRIL 24, 2003, MEETING REGARDING THE REGULATORY FRAMEWORK FOR BROWNS FERRY UNIT 1 RESTART PROJECT (TAC NO. MB7679)

### Background

On April 24, 2003, the U.S. Nuclear Regulatory Commission (NRC) staff met with Tennessee Valley Authority's (TVA's) representatives at the NRC Headquarters in Rockville, Maryland. The objective of the meeting was to facilitate NRC staff's review and approval of the regulatory framework for the restart of Browns Ferry Nuclear Plant (BFN), Unit 1. TVA submitted the regulatory framework by a letter dated December 13, 2002, which was supplemented by a letter dated February 28, 2003 [ADAMS Accession Numbers are ML023600026 and ML030620692, respectively]. The supplemental letter of February 28, 2003, added Bulletin 79-12 to Table 1 of the enclosure to the December 13, 2002, letter. The meeting was classified as a Category 1 meeting. Attachment 1 is a list of attendees, and Attachments 2 and 3 are copies of TVA's handout distributed during the meeting. Attachment 2 contains TVA's agenda for the meeting.

The first part of the presentation focused on background information regarding the three BFN units, which are essentially identical. The three units were voluntarily shut down in 1985 because of regulatory and management issues. The NRC issued a letter pursuant to Title 10, *Code of Federal Regulations* (10 CFR), Section 50.54(f), requesting TVA to specify corrective actions that would be completed prior to restart, and confirming TVA's commitment not to restart any unit without NRC's concurrence. Subsequently, Unit 2 restarted in May 1991, and Unit 3 in November 1995, following Commission briefings.

On May 16, 2002, TVA's Board of Directors decided to restart BFN Unit 1 in 2007, based on the completion of a detailed study regarding the need for power and the issuance of a favorable Supplemental Environmental Impact Statement performed by TVA. To achieve this goal, TVA plans to implement the same type of programs on Unit 1 that were used for the restart of Units 2 and 3, and to incorporate improvements and lessons learned. TVA is assigning dedicated resources for Unit 1 restart, including personnel with experience on the restart of Units 2 and 3.

### Discussion

TVA's submittal of December 13, 2002, addressed: (1) Generic Communications, (2) Special Programs, (3) Commitments, (4) Operational Readiness, (5) Communications, (6) Technical Specifications (TSs). These items are discussed below.

### 1. Generic Communications

TVA provided Attachment 2 in support of the completeness of the list of bulletins and generic letters (GLs) issued since 1985. The attachment shows how TVA had dispositioned the majority of these issues for BFN Unit 1. TVA will address new generic communications in accordance with their schedule requirements. The staff requested, and TVA agreed to provide, formal notification of the completion of each generic communication within 90 days of its internal commitment completion. In response to a staff question regarding the adoption of the Boiling Water Reactor Vessel Internal Project (BWRVIP) for BFN Unit 1, TVA representatives stated that, as part of their plant procedures which are applicable to all three units, they will follow the VIP guidelines and will perform the inspections recommended by the BWRVIP at BFN Unit 1.

### 2. Special Programs

TVA listed 27 special programs in Table 3 of the December 13, 2002, submittal. One of the 27 items, the "Probabilistic Safety Assessment (PSA)," is also listed among the five special programs considered as complete for all three units prior to Unit 3 restart. In response to a comment from the NRC staff, TVA representatives stated that (1) they will submit the Unit 1 individual plant examination for external events (GL 88-20, Supplement 4) as stated on page E1-8 of the enclosure to the December 13, 2002, letter, and (2) currently, they are developing a Unit 1 Probabilistic Safety Assessment, assuming all 3 units are operating, for their internal use. TVA intends to implement the special programs in accordance with the Unit 3 implementation and design criteria precedents. Changes to design criteria will be addressed using the 10 CFR 50.59 and 50.90 processes, and deviations from implementation precedents will be made in accordance with TVA's internal processes. For significant differences in modifications for Unit 1 as compared to Units 2 and 3, the staff requested, and TVA agreed to provide, a description of these modifications approximately 6 months prior to implementing them to support the NRC inspection planning. In addition, TVA will formally notify NRC upon completion of each of these special programs.

### 3. Commitments

TVA's commitment management program is consistent with NEI [Nuclear Energy Institute] 99-04, "Guidelines for Managing Commitments," which was endorsed by the NRC Regulatory Issue Summary 00-17. TVA does not plan to formally notify NRC of the completion of each commitment, however, its processes would ensure that all the restart commitments are completed prior to restart. The NRC regional staff will provide the necessary oversight of the commitment completion. The NRC staff agrees with TVA's proposal that previous commitments that are not commitments under today's regulatory guidance will be dispositioned or implemented using current processes at the BFN.

### 4. Operational Readiness

TVA's representatives discussed their actions to ensure an adequate transition to a three-unit site. Their operational readiness plan is structured to consider the changes associated with operating such a site, in that, among other things, additional resources would be required. The BFN operators are licensed on all three units. TVA's operational readiness program consists of

two primary elements: self assessments and independent reviews (e.g., Institute of Nuclear Power Operations and TVA's Nuclear Safety Review Board).

#### 5. Communications

TVA proposed periodic meetings with the NRC staff on BFN Unit 1 project status and meetings on specific issues. The staff is in general agreement with this proposal.

#### 6. TSs

TVA representatives stated that the NRC staff approved the Unit 1 Improved TS conversion in 1998 subject to License Condition 2.C.4, which is included in License Amendment 234. The license condition requires TVA to review the TS changes made by License Amendment 234, and any subsequent TS changes, to verify that the required analyses and modifications needed to support the changes are complete and submit them for NRC review and approval prior to entering the operational Mode for which the TS applies. A listing of these changes was provided in Enclosure 1. TVA proposed a method for meeting the license condition that will not require submittal of the supporting analyses for staff review and approval. The NRC staff stated that this issue will be discussed further in the future.

#### Conclusion

In accordance with the above, the staff expects that TVA will provide the following documentation: (1) letter report notifying NRC of the completion of each generic communication within 90 days of TVA's internal commitment completion, (2) TVA will formally notify NRC upon completion of each of the special programs, (3) an annual summary of changes to design criteria under 10 CFR 50.59 (the first to be submitted in September 2003), and (4) for significant differences in modifications, TVA will formally provide a description of these modifications approximately 6 months prior to implementing them to support the NRC inspection planning.

The NRC staff requested the following information: (1) the type of American Society of Mechanical Engineers Code components that are being replaced and the codes being used for procurement and installation, and (2) how TVA intends to satisfy the requirements for vessel weld inspections. TVA representatives agreed to provide the requested information.

At the conclusion of the business meeting, the staff indicated its general agreement with TVA's approach regarding the above items for the restart of BFN Unit1.

Comments from members of the public

Following the conclusion of the business meeting and in response to the NRC staff's request, the member of the public who was in attendance indicated that she had no comments.

Please direct any inquiries regarding this meeting to me at 301-415-1496 or [KNJ@NRC.GOV](mailto:KNJ@NRC.GOV)

***/RA/***

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Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-259

Attachments: As stated

cc w/atts: See next page

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**ATTENDANCE LIST**  
**NUCLEAR REGULATORY COMMISSION STAFF MEETING**  
**WITH TENNESSEE VALLEY AUTHORITY**  
**AT NRC HEADQUARTERS**  
**REGULATORY FRAMEWORK OF BROWNS FERRY UNIT 1 RESTART PROJECT**  
**APRIL 24, 2003**

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